CCRRES. CONTROL OUTGOING LTR. NO. DOE ORDER # 4700.1

LTR ENC

ISTRIBUTION

BURLINGAME, A.H. BRANCH, D.B. CARNIVAL, G.J. L'AVIS, J.G. FERERRA, D.W. FRAY, R.E.

AMARAL, M.E.

GEIS, J.A. GLOVER, W.S. GOLAN, P.M. HANNI, B.J. HARMAN, L.K.

HEALY, T.J. HEDAHL, T.

HILBIG, J.G.

KELL, R.E.

HUTCHINS, N.M. JACKSON, D.T.

KUESTER, A.W. MARX, G.E.

McDONALD, M.M McKENNA, F.G.

MONTROSE, J.K.

MORGAN, R.V.

SANDLING, N.B.

SCHWARTZ, J.K. SETLOCK, G.H. WART, D.L.

ER, S.G.

VOORHEIS, G.M. WILSON, J.M.

(2)

ACTION TRACKING X

PRIMROSE

SCHUBAE

TUBIN, P.M.

POTTER, G.L. PIZZUTO, V.M. RISING, T.L.

95RF01570. EG&G ROCKY FLATS

		. /
—	28	/\
_ /	~ 10	/)
		•

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 9, 1995

95-RF-01570

Jessie M. Roberson Assistant Manager for Environmental Restoration DOE/RFFO

SUBMITTAL OF ENFORCEABLE PROJECT MILESTONES AND REVISED PROJECT SCHEDULE FOR OPERABLE UNIT (OU) 15, INSIDE BUILDING CLOSURES, TO THE DEPARTMENT OF ENERGY/ROCKY FLATS FIELD OFFICE (DOE/RFFO) - SGS-050-95

Action: Submittal of enforceable project milestones and revised project schedule to the Colorado Department of Health and Environment and the Environmental Protection Agency (EPA) by DOE/RFFO

The purpose of this letter is to transmit the enforceable project milestones and revised project schedule to DOE/RFFO.

This revised schedule has been developed in compliance with the revised approach to closure of OU 15 and as requested by the OU 15 Phase I RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) Report approval letter. The referenced approval letter stated that the radiological program, currently in place at Rocky Flats, must be "institutionalized" and that "DOE must propose milestone dates for the activities which will bring closure to this operable unit." The requested milestones and proposed dates are listed below along with key assumptions. Further, the revised project schedule is attached for DOE/RFFO's use.

The basis of the revised schedule is duration-based. Turnaround times for DOE/RFFO and the regulatory agencies were extracted from the Interagency Agreement and used throughout the schedule. Specifically, DOE/RFFO shall have 42 working days for each task, and the regulatory agencies have 35 days for their review periods. The basis directs that each agency will have the scheduled time no matter what delay is caused by the previous activity. The duration-based basis of scheduling then dictates day-for-day extensions for all delays incurred. An example of this basis follows: EPA takes 40 days to review the Draft Proposed Plan. EPA therefore causes a five-day delay (40 - 35 = 5). DOE/RFFO will then have 47 days from receipt of EPA comments to complete the next task (42 + 5 = 47). Thus, DOE/RFFO has received a five-day extension due to EPA-caused delays. This scenario works the same for DOE/RFFO-caused delays.

Proposed Milestones

- Submit Draft Proposed Plan/Draft RCRA Permit Modification March 31, 1995
- Submit Final Proposed Plan/Draft RCRA Permit Modification July 19, 1995

CORRES. CONTROL X ALMIN RECORDURES PROJECT FILE PATS CLASSIFICATION UCNI UNCLASSIFIED CONFIDENTIAL SECRET AUTHORIZED CLASSIFIER SIGNATURE -9-25 du SK For Public Rolling IN TEPLY TO BEP CO NO: AUTION ITEM STATUS: PARTIAL/OPEN CLOSED 🔀 LETTER APPROVALS: ALP ORIGINATO & TYPIST INITIALS RTQ: ilm

Jessie M. Roberson February 9, 1995 95-RF-01570 Page 2

Key Assumptions

- DOE/RFFO and the regulatory agencies will support the revised schedule.
- All delays in submittal or review will be considered as day-for-day extensions for the succeeding activities and milestones.
- Dispute durations will be considered day-for-day extensions.
- The approach for closure once approved in the Draft Proposed Plan will not change.
- The public involvement period will not exceed 60 calendar days (42 working days).

If you have any questions regarding this correspondence, please contact Rich Ray at telephone extension 8557.

S. G. Stiger, Director

Environmental Restoration Program Division

EG&G Rocky Flats, Inc.

RJR:jlm

Orig. and 1 cc - J. M. Roberson

Attachment: As Stated

CC:

W. Fitch – DOE/RFFO

M. N. Silverman -

2 2 2 2 2 2 2 2 2 2					8	OU15 : INSIDE BUILDING	BUILDING CLOSURES - PROPOSED MILESTONE SCHEDULE - FEBRUARY 9, 1995	ILESTONE SCHEDUL	E. FEBRUARY 9, 1995					95-Ri Page	95-RF-01570 Page 1 of 3	
11 27700 forms 12 12 12 12 12 12 12 1				-			L	L	L		_					Ī
100 2078 Store 41945 Stope 41945 Sto		Name			cheduled Start	Scheduled Finish	Mer Apr	3	Oct May	8	┥~	La Aug	غ	_	1	7
TemPring RCRA Permit Mod. (DRPM) 66 27295 6:00am 3/31/95 6:00am 6 272/95 6:00am 7/14/95 6:00am		0015 SCHEDULE ABJUSTMENT		-	2/2/95 8:00am	4/18/96 5:00pm					-+-	200	š	_	E P	<u>ē</u>
The property of the property	2						***********				>		-			
100 200	က	Draft Proposed Plan		P 4	2/2/95 8:00am	3/31/95 8:00am										
15d 2/15/95 6:00cm 3/2 2/15/95 6:00cm 3/20/95 5:00cm 15d 2/15/95 6:00cm 3/20/95 5:00cm 15d 2/28/95 6:00cm 3/20/95 5:00cm 15d 2/28/95 6:00cm 3/20/95 5:00cm 15d 2/28/95 6:00cm 3/20/95 5:00cm 15d 3/20/95 5:00cm 2/20/95 5:00	4	Develop Oraft Proposed Plan(DPP)(D R	CRA Permit Mod. (DRPM)	28	2/2/95 8:00em	2/9/95 5:00pm	, , , , , , , , , , , , , , , , , , ,									
15 27,285 500m 22,085 500m 20,085 500m 10 10 10 10 10 10 10	50	Classify & Transmittal to DOE		8	2/10/95 8:00am	2/14/95 5:00pm									- <u>-</u>	
152 271055 Sobra 372055 Sobra 1 271055 Sobra 272055 S	9	DOEFEG&G Review and Comment		38	2/15/95 8:00am	2/27/95 5:00pm							<u> </u>			
10 10 10 10 10 10 10 10	7	Comment Incorporation		120	2/28/95 8:00em	3/20/95 5:00pm				···			٠			
1 274/195 6-50km 271/195 6-50km	6 0	Classify & Transmittal to DOE		8	3/21/95 8:00am	3/23/95 5:00pm		·			-					
Content Cont	တ	DOE Submit DPP/DRPM		28	3/24/95 8:00am	3/30/95 5:00pm	Am									
256 41755 600km 51755 600km 517555 600km	2	Complete DPP/DRPM - External		8	3/31/95 8:00am	3/31/95 8:00am	•									
256 41/85 & 600m 51/895 & 500pm 1/895	=			-												
1 1 1 1 1 1 1 1 1 1	13	Agency Review		750	4/1/95 8:00am	5/19/95 5:00pm										
tot Cold-bell 311985 6:00pm 311785 5:00pm 4 use Plan' document 54 21385 6:00pm 211395 6:00pm 211395 6:00pm 1 UVI \$ MSSs 54 212395 6:00pm 212495 5:00pm 1 1 UVI \$ MSSs 54 212795 6:00pm 227495 6:00pm 1 Out of extriction review 54 22795 6:00pm 317955 6:00pm 1 Out of extriction review 54 317955 6:00pm 1 Annual Review Complete 54 317955 6:00pm 1 Annual Review Complete 54 317795 6:00pm 1	13	CDPH&E/EPA Review & Comment of D	PPIDRPM	329	4/1/95 8:00em	5/19/95 5:00pm										
25d 21/395 6x00m 21/795 6x00m 21/395 6x00m	4	Agency Draft PP Complete			5/19/95 5:00рт	5/19/95 5:00pm										
256 21/385 & 600m 21/185 & 500pm 11/385 & 600pm 21/185 & 500pm 21/385 & 600pm 21/385 & 500pm 22/485 & 500pm	15															
a exchites cumpleted 5d 271395 6:00bm 272495 6:00bm 272495 6:00bm 272495 6:00bm 272495 6:00bm 272495 6:00bm 272495 6:00bm 272795 6:00bm 27279	8	RCRA Certification			213/95 8:00em	3/17/95 5:00pm	ļ								****	
1015 B155.5 54 272795 6-00am 31295 5-00pm 1	11	Engineer Review of "Closure Plan" docu	ments		2/13/95 8:00am	217/95 5:00pm										=
U15 RISSs 56 2/27/96 6:00am 3/395 6:00pm 1 vent personnel 56 2/27/96 6:00am 3/3995 6:00pm 1 ce cartification review 56 3/27/96 6:00am 3/17995 6:00pm 1 sure submitted 56 3/17995 6:00pm 3/17995 6:00pm 1 sure Review Complete 0d 3/17995 6:00pm 3/17995 6:00pm 3/17995 6:00pm sure Review Complete 0d 3/17995 6:00pm 3/17995 6:00pm 3/17995 6:00pm	<u>s</u>	Engineer review of closure activities con	mpleted		2/20/95 8:00am	2/24/95 5:00pm							*****			
certification review 5d 3/3/95 6:00pm 3/1/95 5:00pm I sure submitted 5d 3/1/95 6:00pm 3/1/95 5:00pm 4 sure Review Complete 0d 3/1/95 5:00pm 3/1/95 5:00pm 4 sure Review Complete 0d 3/1/95 5:00pm 3/1/95 5:00pm 4	2	Engineer Site visit of six OU15 INSSs			2/27/95 8:00am	3/3/95 5:00pm			<u>-</u>							
Summary Sed 36696 8:00cm 317095 6:00cm 317795 6:00cm 317795 5:00cm 317795 5:00c	8	Engineer interview wirelevant personne		L	Z/Z7/95 8:00am	3/3/95 5:00pm		· · · · · · · · · · · · · · · · · · ·								
Sure submitted 5d 31/385 8:00km 31/785 5:00km	21	Engineer's report of closure certification	review	38	3/6/95 8:00am	3/10/95 5:00pm				·						
Sure Review Complete 0d 317785 5:00pm 317785 5:00pm ◆ Critical Progress Summary Summary ◆ Rescribical Critical Milestees ◆ Relied Up ◆	n	Engineer's RCRA Clean Closure submitt	*		3/13/95 8:00am	3/17/95 5:00pm			<u></u>					·		
Critical Williams Progress Summary Process Annual Milestens Progress Process P	g	Engineer RCRA Clean Closure Review C	omplete	_	3/17/95 5:00pm	317/95 5:00pm	•									-
Critesi Progress Summania Summ	54						•	w 1						,		
Critical Nescritical Critical Milestens																٦
	Project: 01 Date: 2/8/9		cal ()		Progress Critical Miles	tiene ◆	Summary Rolled Us	 								T
																Т

Attachment

Attachment 95-RF-01570 Page 2 of 3 Otr 1, 1997 Otr 2, Jan Feb Mar Apr May Oct Nov Dec Otr 3, 1996 Jul Aug Sep Otr 1, 1996 Otr 2, 1996 Jan Feb Mar Apr May Jun
 Or 1, 1995
 Or 2, 1995
 Or 3, 1995
 Or 4, 1995

 Jan
 Feb
 Már
 Apr
 Már
 Jun
 Jul
 Aug
 Sep
 Oct
 Nov
 Doc
 OU15 : INSIDE BUILDING CLOSURES - PROPOSED MILESTONE SCHEDULE - FEBRUARY 9, 1995 Ó Rolled Up Scheduled Finish 3/31/95 5:00pm 3/31/95 5:00pm 7/19/95 8:00am 9/15/95 5:00pm 11/14/95 5:00pm 3/31/95 5:00pm 6/2/95 5:00p 7/6/95 5:00pm 7/11/95 5:00pr 7/18/95 5:00pm 7/19/95 8:00ar 9/15/95 5:00pm 10/11/95 5:00pm 10/25/95 5:00pm 6/8/95 5:00p 6/22/95 5:00p 8/17/95 5:00pr 9/15/95 5:00pr 9/15/95 5:00pr 9/22/95 5:00pr 11/1/95 5:00pm 10/6/95 5:00pr Critical Milestone Scheduled Start 3/20/95 8:00am 5/20/95 8:00em 3/20/95 8:00am 3/31/95 5:00pm 9/16/95 8:00am 5/20/95 8:00am 673/95 8:00em 6723/95 8:00em 7/12/95 8:00em 7/19/95 8:00am 7/20/95 8:00am 7/20/95 8:00em 6/9/95 8:00em 7/7/95 8:00em 9/14/95 8:00am 9/15/95 5:00pm 9/16/95 8:00am 10/7/95 8:00am 10/12/95 8:00am 10/26/95 8:00am 8/18/95 8:00am 9/23/95 8:00am Progress <u>10</u> 3 Ë **4**24 ğ \$ 훒 2 종 38 8 2 21d 214 77 8 424 B 喜 ヌ 乭 3 Prepare Draft Record of Decision/Corrective Action Decision Draft Record of Decision/Corrective Action Decision (CAD/ROD) Noncritical DOE/EG&G Review Final Proposed Plan! RPM DOEFEG&G Review & Comment - DROC/CAD Critical DOE Submit FPP/RPM to COPHREFEPA Incorporate CDPH&E/EPA comments Incorporate Comments on DCAD/ROD Incorporate ODE/EG&G Comments Complete Final PP/RPM - External Classify and Transmittal to DOE Complete Public Comment Period CDPH&E Review and Approval Classify & Transmittal to DOE RCRA Certification Complete Classify & Transmittal to DOE Public Comment Summary Agencies Submit to Public Project OU15:INSIDE BUILDING CLOSURES Date: 2/8/95 Public Comment Period CDPH&E RCRA Approval Public Involvement Pariod Public Hearing Final Proposed Plan

묘성 92

33

Ħ 뛵 8 33 8 42 13 £ 8 8

Page 2

Attachment 95-RF-01570 Page 3 of 3
 Orr 1, 1986
 Otr 2, 1996
 Otr 3, 1996
 Otr 4, 1996
 Otr 4, 1996
 Otr 1, 1997
 Otr 2, 1996

 Jan
 Feb
 Mar
 Apr
 Mar
 Jun
 Jul
 Jul
 Aug
 Sup
 Ocr
 Nov
 Dec
 Jan
 Feb
 Mar
 Apr
 Apr
 Apr
 Mar
 Apr
 Mar
 Apr
 Apr
 Mar
 Apr
 Apr
 Apr
 Mar
 Apr
 Otr 4, 1995 OU15 : INSIDE BUILDING CLOSURES - PROPOSED MILESTONE SCHEDULE - FEBRUARY 9, 1995 Oct Nov
 Otr 1, 1995
 Otr 2, 1995
 Otr 3, 1995

 Jan
 Feb
 Mar
 Apr
 May
 Jun
 Jul
 Aug
 Sep
 Page 3 Rolled Up Scheduled Finish 11/6/95 5:00pm 1/2/96 5:00pm 11/13/95 5:00pm 11/14/95 5:00pm 1/2/96 5:00pm 2/29/96 5:00pm 1/17/96 5:00pm 1/22/96 5:00pm 2/29/96 5:00pm 1/2/96 5:00p 2/5/96 5:00pm 7/11/96 5:00pm 7/11/96 5:00рт 2/19/96 5:00pr 7/11/96 5:00pm 2/29/96 5:00pr 4/18/96 5:00pm 4/18/96 5:00pm 4/18/96 5:00pm 2/22/96 5:00p Critical Milestone Scheduled Start 11/2/95 8:00am 11/7/95 8:00am 11/14/95 5:00pm 11/15/95 8:00am 11/15/95 8:00am 1/2/96 5:00pm 1/3/96 8:00am 1/3/96 8:00am 1/18/96 8:00am 1/23/96 8:00em 2/6/96 8:00am 2/20/96 8:00am 2/29/96 5:00pm 3/1/96 8:00em 7/11/96 5:00pm 3/1/96 8:00am 4/19/96 8:00am 4/19/96 8:00am 2/23/96 8:00arr 4/18/96 5:00pm Progress B **PS**C 32 8 42d = 豆 B ヌ æ 3 32 354 Š 8 졅 CDPH&E/EPA Review and Comment - DCAD/ROD **Hencritica** DOE/EG&G review and comment - FCAD/ROD Incorporate comments DOE/EG&G F CAD/ROD Critical COPH&E/EPA Approval of Final CAD/ROD Complete Draft CAD/ROD - External Incorporate CDPH&E/EPA comments Complete Final CAD/ROD - External Agency Draft CAD/ROD Complete Classify & Transmittal to DOE Classify & Transmittel to DOE Classify & Transmittal to DOE OOE Submit to COPH&E/EPA DOE Submit to CDPH&E/EPA Project OU15JNSIDE BUILDING CLOSURES Date: 2/8/95 **Draft CAD/ROD- Agency** CAD/ROD Adoption CAD/ROD ADOPTION Final CAD/ROD Project Close out Project Complete Project Closure 요요 5 22 23 딿 ¥ 8 22 88 B 윦 5 62 ಟ æ 32 _ 22 E